

Investment and Regeneration Adaptation Policy

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1. Aim

Argyll Community Housing Association is committed to providing an adequately resourced and efficient disabled adaptation procurement and management service that addresses the needs of its tenants and the requirements of the Disability Discrimination Act 1995 (See Appendix 1).

2. Objectives

The key objectives of the Adaptation Policy are:

- To put the needs of disabled residents first in the Association's decision-making about adaptations.
- To support people to stay in their own homes and arrange appropriate adaptations.
- To ensure that properties with adaptations are clearly identified on a register so that best use of these properties can be made as they become available. In allocating these properties, applicants requiring an adapted property will be given priority over those who do not.
- To maximise the grants and other resources available for adaptations, ensuring value for money at all times.
- To work closely with partners in the Local Authority and Health Service to make adaptations to disabled residents' homes.
- To comply with all statutory and regulatory requirements in relation to disabled adaptations.
- To comply with good practice guidance, including the 'Housing for Varying Needs' Design Guide issued by Communities Scotland.

3. Identifying Needs

Tenants of any age can apply for an adaptation for themselves or members of their household, but there must be a proven need.

If a tenant or someone in their household are older, disabled, or less able to manage personal and domestic tasks, or if their carer's own health is at risk from assisting, then an adaptation may be of benefit.

An annual review of spend on adaptations, including costs, types of adaptation and trends will be undertaken to ensure the adaptation policy and the associated budget is effective and appropriate.

Each year a budget for adaptations will be agreed internally and then with Communities Scotland. Expenditure will not exceed the budget. In the event of demand exceeding the budget, ACHA will work with the Council's occupational therapists to prioritise cases.

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4. Assessing tenants' needs

Assessment may be carried out through one or a combination of the following:

Self referral: Tenants ask the Association or Social Work for an assessment for adaptations.

ACHA referral: A member of the Association's staff may identify a potential need for adaptations in consultation with tenants. An assessment should be made of the estimated costs:

- Estimated cost below £200: Where such needs are identified, the adaptation will be instructed through the small adaptation budget. A self-referral form will require to be completed with the tenant.
- Costs above £200 or where the tenant's needs are complex: A referral must be made to an Occupational Therapist.

Occupational Therapist: They receive referrals from a variety of sources and will pass to the Association for action.

Option Appraisal: Where the OTs assessment indicates that high cost adaptation works are required, the association may carry out, or commission, an option appraisal to assess the housing options and alternatives available to the tenant. See appendix 2.

5. Options for Adaptations

5.1 Investment Programme

As part of the planning process for investment, the Association will establish whether there are disabled people living in the households targeted for improvement. Where such households are identified, the Association will aim to ensure that the improvements meet their needs.

For example, if a bathroom is to be renewed then consideration will be given as to whether a grab rails are required or a level access shower need to be fitted.

5.2 New Build Programme

ACHA plans to build around 150 new homes a year from 2007. ACHA will ensure that all new build properties are built to barrier free standard at ground floor level, in compliance with 'Housing for Varying Needs' design guide published by Communities Scotland. A minimum of 10% of all new homes will also be built to fully wheelchair accessible standard. Where tenants can be identified early enough in the planning process, their specific needs will be incorporated in the design of the new houses. If their needs are complex, an Occupational Therapy report will be requested and additional funding sought from

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Communities Scotland. An adaptation that takes place during the initial build period is termed a 'Stage 2' adaptation in Communities Scotland Guidance, see appendix 3.

5.3 Transfer to an adapted property

There are some properties which have been built or previously adapted for disabled people. In some cases, it will be easier and quicker for the disabled person to move into one of these properties rather than adapt the property in which they live. An options appraisal may be required to assess the alternatives. If a transfer seems the most effective means of meeting a tenant's needs, then a member of staff will discuss the options with the tenant and, if agreed, arrange for the transfer.

5.4 Existing adapted property

The Association will ensure that it makes the best possible use of the houses that are already adapted or specially designed for people with disabilities. The Association will develop a register of adapted houses and where possible (and within the guidelines of the allocations policy) will try to match them to applicants whose needs will be addressed by those properties.

5.5 Small Adaptations

ACHA will set an annual small adaptations budget to meet the need for adaptations in existing stock. If items are due to be upgraded through the investment programme, the work may be included in these works. Small adaptations are considered to be valued at less than £200.

ACHA will carry out minor adaptations to our tenants' homes. Minor adaptations include installing additional handrails at entrance doors or on stairs or grab rails beside a bath or W.C.

A basic self-assessment questionnaire should be completed with the tenant to support their need.

An annual budget will be set for small adaptations and this budget will not be exceeded.

5.6 Large adaptations

Larger adaptations to our tenant's homes, such as stair-lifts, special baths, kitchen units and other equipment can be provided by ACHA, but a grant will be required to carry out the work. The association will not undertake large adaptations where the tenant is seeking a transfer.

A budget will be agreed with Communities Scotland through the Strategy and Development Funding plan on an annual basis and will be available for adaptation work.

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Adaptations to existing properties are termed 'Stage 3' adaptations by Communities Scotland and their guidance for adaptation work is in appendix 3.

The Association will need to obtain a report from an occupational therapist confirming that the tenant needs the adaptation requested.

6. Prioritisation

Occupational Therapists give a priority grading in their assessment from 1 to 3:

- Priority 1 Imminent risk to physical safety of individual or their carer.
Facilitate discharge from hospital.
Terminal illness.
- Priority 2 The client has difficulty in carrying out essential daily activities and has no regular support e.g. lives alone.
Children with disability. Impact of disability affecting family.
- Priority 3 The client has difficulty in carrying out essential daily activities and has some support to assist them with their difficulties.

ACHA will consider target timescales for the completion of the above priorities.

7. Rent Review and Service Charges

The Association will review the rent of a property where major works are carried out to create additional room(s) in line with the Rent Policy and with due regard to the Disability Discrimination Act 1995.

The Association will not charge an additional rent or service charge for the provision and/or maintenance of adaptations.

8. Right to Buy

An application to purchase a house which is "purpose built" or "adapted" to meet the disability needs which forms part of a "group" of houses will be exempt from the Right to Buy.

9. Information and Advice

The Association will provide user-friendly information on the Adaptation Policy and processes for both new and existing tenants.

10. Staff training

The Association will provide training for staff to raise awareness on disability issues; and the adaptations policy and procedures.

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11. Performance Targets

The Association will assess its performance on undertaking adaptations by reviewing the following annually:

- Budget spend against actual spend
- Average waiting time
- Number of properties improved

The Association will ensure that a customer satisfaction form is sent to each tenant in receipt of an adaptation and the results collated on an annual basis.

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Appendix 1 - Legal and Regulatory Framework

The legislation relevant to the Disabled Adaptations Policy is:

The Disability Discrimination Act 1995 ('the DDA') – part 3 imposes duties on service providers to make 'reasonable adjustments' to services without which it would be 'impossible or unreasonably difficult for the disabled person to use the service'. From 1 October 2004 where a physical feature makes it impossible or unreasonably difficult for disabled people to access goods or services, the organisation is required to take reasonable steps to:

- remove the feature, or
- alter it so it no longer has that effect, or
- provide a reasonable means of avoiding the feature, or
- provide a reasonable alternative method of making the service available

These provisions refer to public space and services offered by the Association including offices and the communal areas to flats and sheltered housing schemes. They do not require works to the inside of residents' homes which would be funded by disabled adaptations' budgets and Communities Scotland's grants. However, the Association will work within the spirit of the DDA in creating accessible homes for all its residents.

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Appendix 2 - Options appraisal process

Where a high value adaptation is being considered for a tenant, the Association may choose to undertake an options appraisal.

The Association will look separately at the circumstances of each application and balance against the resource implications the following factors: -

- Existing adaptations
- The long-term usability of the proposed adaptation(s).
- The tenants' needs and wants and any personal or other factors that the tenant puts forward as demonstrating a need to remain in their existing accommodation.
- The availability of the tenant's existing support network and carers.
- The cost of the adaptations necessary to the current property.
- The adaptability of the current property.
- The under-occupation of the present accommodation.
- Property type and demand.
- The likely availability of more appropriate alternative accommodation.

The Association will decide if the necessary adaptations should be carried out, or whether a more suitable property should be found. If the latter, due regard will be given to the applicants preference for area and type of alternative property.

The association may also spend an amount, no more than the estimated cost of adaptations to the current property, on any of the following that are relevant: -

- Removal costs
- Adaptations to the new property.
- Costs associated with moving e.g. redecoration, dis/reconnections, and the refitting of carpets and curtains.
- Urgent minor adaptations to the existing home whilst a move is awaited.

The tenant will be kept informed in writing of the decisions of the association. Tenants will have the right to appeal against the Association. The Director of Investment and Regeneration and an independent officer from the Occupational Therapy service will review the appeal. Where applicable, all tenants will be advised in writing regarding the appeal procedures, and can be represented during the process itself either in person, by letter, or by an advocate.

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Appendix 3 - Scottish Homes Guidance Note SHGN 01/07

This Guidance Note replaces SHGN 97/09 “Procedures for HAG funding of stage 3 adaptations” and has primarily been produced to reflect an amendment to the rules on the procurement of Stage Three adaptation works. The arrangements summarised below will now apply with immediate effect. These are described in greater detail in Section 8 of the Guidance Note.

- **Works contract estimated to cost up to £15,000**

Associations now have discretion to select how adaptation works with an estimated contract value of up to £15,000 are procured within the context of achieving value for money/best value and the association’s own policy threshold for procuring contracts.

- **Works contract estimated to cost over £15,000**

A full tendering procedure is required under the accepted code of practice for works with an estimated contract value of over £15,000. Any other arrangement, such as a negotiated tender, will require the prior approval of Scottish Homes.

Scottish Homes is printing amended versions of Forms HAG A1, HAG A2 and HAG A3 to reflect the above arrangements. Copies of the new Forms will therefore be available shortly.

Any queries regarding the content of this Guidance Note should be directed to Scottish Homes’ Regional Offices. Additional copies of this Guidance Note can be obtained by contacting Reception, Thistle House, 91 Haymarket Terrace, Edinburgh, EH12 5HE (Tel. 0131-313-0044).

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HAG Procedures – The Funding of Adaptations

Introduction

1. These procedures primarily relate to applications for approval of Housing Association Grant to adapt existing accommodation to suit the requirements of individual tenants who have a physical disability or sensory impairment.
2. Adaptation works are classified in three groups:-
 - a. **Stage One** – design features that are not specific to a particular condition or individual and that are incorporated into the initial specification for the property prior to its construction or improvement.
 - b. **Stage Two** – adaptations to a property to suit the particular requirements of the tenant to whom it has been allocated before, or close to, practical completion of construction or improvement works. The original contractor may carry out these adaptations.
 - c. **Stage Three** – works to adapt a property to suit the changing needs of the existing tenant, or of a new tenant, where these could not reasonably have been identified when the property was originally provided.
3. Applications for funding of Stage One and Stage Two adaptations should normally be included in main scheme submissions. Cost estimates and payment claims for Stage Two adaptations to be funded by Scottish Homes should be shown separately from other scheme costs and will qualify for 100% HAG funding.
4. Where housing is being provided for low cost home ownership, works associated with Stage One and Stage Two adaptations will be eligible for Housing Association Grant on the basis that any adaptation work carried out during construction/improvement is reflected in the property valuation. Stage Three adaptations are not eligible for HAG since sharing owners should be eligible for local authority grants in the same way as owner-occupiers.
5. The procedures described in the remainder of this note relate solely to Stage Three adaptations – except where it can be shown that previous Stage Two adaptations have now reached the end of their useful life and require replacement.

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Types of Adaptation Work Eligible for HAG

6. Stage Three adaptation works potentially eligible for HAG funding should essentially be of a permanent nature. Examples of items that may be eligible for HAG funding are shown in Appendix 1. Other works may be the responsibility of other authorities such as Health Boards or Social Work Departments, as described in the Scottish Office Circular *Community Care, the Housing Dimension* (1994). HAG support will not normally be available to cover items that are the responsibility of other agencies. Adaptation works that are not the responsibility of other agencies and that are agreed to be eligible for HAG will attract 100% grant.
7. Social Work Departments, in collaboration with Health Authorities, have a responsibility to provide specialist advice on the specific needs of people with a physical disability. All applications for approval of HAG for Stage Three adaptations must be based on specialist advice, or on medical opinion, and must comply with specialist recommendations. This will ordinarily entail the provision of a letter or report from a suitably qualified expert, such as an Occupational Therapist. With the agreement of Scottish Homes' Regional Offices, the requirement to obtain such independent specialist advice may be waived for funding applications for minor works (for example, provision of handrails).

Procurement of Works Contracts

8. To qualify for HAG funding, Stage 3 adaptation works should comply with the following requirements:-

Works contract estimated to cost up to £15,000

Associations now have discretion to select how adaptation works with an estimated contract value of up to £15,000 are procured within the context of achieving value for money/best value and associations' own policy thresholds for procuring contracts. Associations must be able to demonstrate that this is the case if asked to do so by Scottish Homes.

Scottish Homes does not wish to prescribe how adaptation works within this estimated contract value should be procured as a number of options exist that associations may wish to consider. For example, associations may wish to accept a single quotation from an approved contractor if this is in line with costs previously received as a result of a competitive selection process carried out within the last two years (in which price and quality were taken into account). Alternatively, competitive quotations or competitive tenders could be obtained as a way of demonstrating that value for money has been achieved.

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Works contract estimated to cost over £15,000

A full tendering procedure is required under the accepted code of practice for works with an estimated contract value of over £15,000. Tenders should be open for acceptance for a period of three months. Any other arrangement, such as a negotiated tender, will require the prior approval of Scottish Homes.

In tendering for Stage Three work it is considered good practice for housing associations to ensure that contractors are given clear timescales to complete work and that the tenant should be advised of these. It is recognized that agreed timescales will vary according to the nature of work but associations might wish to develop a set of anticipated completion times for adaptation works of a common nature that can form part of standard tendering procedures. Associations should monitor the performance of contractors and use this information in managing their maintenance programmes.

HAG Application Procedures

Approval of Bids for Funding

9. Wherever possible, associations that anticipate carrying out Stage Three adaptation works should seek approval of an **annual funding allocation** through their Strategy & Development Funding Plans. This will enable Scottish Homes to include an amount for Stage Three adaptations in the programme agreements issued in response to these Plans.
10. Where it has not been possible to carry out an accurate assessment of the Stage Three bid prior to the submission of Strategy & Development Funding Plans, associations may agree with Scottish Homes' Regional Offices to present their funding requirements at a later stage, provided that bids are received in sufficient time to enable Scottish Homes' staff to give them full consideration. Such "late" bids for Stage Three adaptations should generally only apply where an association does not have a regular or large programme of adaptation works.
11. Scottish Homes will appraise all bids for the funding of adaptations within the context of the overall programme and the competing priorities therein.

Streamlined Procedures

12. Adaptation works covered by programme agreements will be subject to a streamlined procedure i.e. associations can instruct works without prior approval of their proposals and may claim HAG following completion of the works provided that the following conditions are met:
 - a. the total cost of providing the adaptations can be met from the amount included in the association's programme agreement for such works **and**

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- b. the total works only cost of the adaptations does not exceed £15,000 per contract **and**
 - c. procurement of the works contract is in accordance with paragraph above.
13. Associations must complete form HAG A3 (Streamlined Procedure - Notification of Completion) for all adaptation works carried out under this streamlined procedure. Payment of HAG cannot be made until the association submits forms HAG A3 and HAG/Payment. To ease the administrative process, associations are requested to “batch” completed adaptations before making submissions to Scottish Homes.

Other Cases

14. If an association has no amount included in its programme agreement for adaptations, or if it needs to exceed the amount originally included, form HAG A1 (Notification of Proposed Work) should be submitted for Scottish Homes’ consideration. If the form HAG A1 is approved, the work may then be instructed and funded under the streamlined procedure, again providing that the cost of the works does not exceed £15,000 per contract and procurement of the works contract is in accordance with paragraph 8 above.
15. A full application for prior approval of HAG will only be required in the following circumstances:-
- a. the adaptation works are not covered by an association’s programme agreement for such works **and/or**
 - b. the total works cost exceeds £15,000 per contract **and/or**
 - c. the association cannot comply with the guidance on the procurement of works contracts given at paragraph 8 above.
16. In such cases, associations are required to submit forms HAG A1 and HAG A2 (Notification of Proposed Works (Tender)) before Scottish Homes will confirm HAG funding for the adaptation works.
17. Where associations are required to submit forms HAG A1 and HAG A2, the two forms may be submitted simultaneously where agreed with Scottish Homes.
18. Where appropriate, claims for payment of grant should be “batched” before form HAG/Payment is submitted to Scottish Homes. Form HAG A3 is not required in cases where associations have submitted forms HAG A1 and HAG A2.

Housing Association Administrative Costs

19. A standard allowance of 10% of works cost will be HAG eligible.

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20. Scottish Homes recognises that in some cases associations may wish to use another party or agency to administer their programme of adaptations. This may have benefits of scale for some associations. Scottish Homes will support associations who wish to do this but the administrative allowance for HAG purposes of 10% will still apply in these circumstances.

Value Added Tax

21. Whilst most Stage Three adaptation works are zero-rated for the purposes of VAT, it would appear that there are some exceptions. Where this applies, associations should establish the requirement to pay VAT with HM Customs and Excise. Any VAT that has to be levied in accordance with the VAT regulations will be treated as a HAG eligible cost.

Approval of Form HAG A1 and Form HAG A2 Applications

22. Scottish Homes will issue its approval of applications on forms HAG A1 and HAG A2 by signing the forms and returning these to the association. Scottish Homes will also insert the costs and grant approved at part 7 of form HAG A2. Where a proposal is rejected or modified the housing association will be given a full explanation of the reasons.

Checking of Housing Association Certificates

23. These procedures reduce the level of information required in support of funding for adaptation works. For example, associations are not generally required to submit copies of specialist/medical assessments and the vast majority of Stage III adaptations will be taken forward using the streamlined procedures described above. To maintain accountability for the subsidy involved, Scottish Homes may ask (on a random basis) for copies of documentation supporting all certifications made by associations on forms HAG A1, HAG A2 and HAG A3.

Monitoring

24. Scottish Homes will use information provided on forms HAG A1, HAG A2 and HAG A3 to assist in monitoring its own contribution to Care in the Community. Associations are also encouraged to develop their own databases of adapted property capturing information detailed in these forms. Improved information on association stock and adaptation programmes will assist associations in subsequent bids for funding.

25. Scottish Homes would be happy to assist housing associations with the task described in paragraph 24 by providing copies of the database for its own housing stock.

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Customer Satisfaction

26. It is considered good practice to ensure that tenants who require adaptation works to their property can expect the same standards of service as if it were a standard repair, in respect of tenants being given the opportunity to give feedback on the works.
27. Associations are encouraged to incorporate any customer feedback and monitoring of adaptation works within procedures already in place for regular maintenance and repair works.
28. Associations should monitor customer satisfaction for management purposes. Scottish Homes may comment on these standards in the course of established monitoring arrangements.

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Appendix 1 - Adaptations to Property for People with Disabilities

Adaptation works to existing dwellings in order to make them more suitable for residents are eligible for HAG if they are by definition “structural”.

The list below, while not exhaustive, gives a number of examples of items that, when provided for a disabled person, are admissible for HAG. These are items that, because they are fixed to or become part of the structure of a dwelling, may be regarded as “structural”.

General alteration

extensions or alterations to provide bathroom, WC or bedroom etc, with level or suitably ramped access.

Garaging and external facilities

widening of garden paths;
carport and/or undercover access to the dwelling if practicable; and
remote control garage door opener to existing garage used by (or for) a disabled driver.

Approaches to entrance doors

modification of steps, for example to widen treads or incorporate half-steps or create ramp;
handrails or balustrading to ramps/steps (and elsewhere in the dwelling where necessary);
and
doorcall and entryphone system.

Doors and windows

widening or re-hanging of doors to permit wheelchair manoeuvre;
substitution of sliding or bi-fold doors for side-hung doors;
suitable ironmongery, for example lever in place of knob handles, pull handles and rails to doors or kicking plates and/or protective edging to door frames and handing stiles;
remote control window and/or door openers; conversion of window to French window where no other wheelchair access to the garden is available;
alterations to windows to give satisfactory sight-lines for people in wheelchairs; and
larger windows for visually impaired people.

Staircase and vertical circulation

additional handrail to staircase or gate at head or foot of stairs;
stairlift installed over staircase, for standing or seated use, or with platform for wheelchair;
and
vertical homelift or hoist.

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Water services

substitution of lever for screwdown taps;
re-fixing of taps at convenient level;
remote control valves for taps;
thermostatic control for shower; and
relocation of control valve for mains water supply.

Electrical and heating services

re-fixing for socket outlets at a convenient level, additional socket outlets or rocker light switches;
alarm call or loud bell for people who are hard of hearing;
relocation of prepayment meters or of thermostat or heating controls;
central heating, or supplementary radiators to existing installation;
fixed heating appliance (gas or electric) in place of open fire or other solid fuel appliance;
fluorescent lights in kitchen, bathroom and working areas for visually impaired people;
warning systems for people who are hard of hearing, for example, flashing lights;
provision of power supply for electric hoists suspended from ceiling track; and
relocation of main switches for gas or electricity.

Provision for lifting aids

reinforcement of ceilings and provision of track for personal hoist.

Acoustic insulation

acoustic insulation.

Entrance halls

letter cages or delivery shelf; and
relocation of clothes hanging rails (also in bedrooms).

Kitchens

alterations to provide fixed storage units, worktops and sink units at convenient levels;
non-slip flooring;
built in cooker for use by disabled person; and
waste disposal unit to sink.

Bathrooms and WCs

shower unit in place of, or to supplement, bath;
shower cubicle, special bath, special WC fixture, suitable washbasin and/or bidet;
raising of WC fixture;
sluice sink;



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fixed bath hoist;
support rails to walls by bath or WC, or other fixed support or non-slip flooring; and
platform at head of bath.

Storage

storage provision for wheelchair.